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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

9 DEBORAH CARROLL, an individual;) Case No. 2:18-cv-00960-JCM-BNW
10)
11 Plaintiff,) **STIPULATION AND ORDER TO**
12) **EXTEND TIME TO REPLY TO**
13 v.) **SUMMARY JUDGMENT**
14) **OPPOSITION**
15 LADAH LAW FIRM PLLC; and RAMZY) **(First Request)**
16 LADAH;)
17)
18 Defendants.)

16 IT IS HEREBY STIPULATED AND AGREED by the parties' counsel of
17 record that Defendants will have an extension of time up to and including January 10,
18 2020 to reply to Plaintiff's Opposition to Defendants' Motion for Summary Judgment
19 (ECF No. 31). Defendants' Motion for Summary Judgment (ECF No. 22) was filed on
20 September 16, 2019. This is the first request for an extension of this deadline.
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22 Since the Opposition was filed, defense counsel has been extensively working
23 on a Ninth Circuit submission that is due November 27 and has had little time to devote
24 to this matter. During the next month, in addition to the holidays, defense counsel has
25 three Early Neutral Evaluations scheduled (including one in Reno), numerous other
26 appearances and deadlines, and family obligations. While the circumstances are not
27 identical, the extension sought is consistent with the six weeks of extra time granted to

1 Plaintiff's counsel with respect to the Opposition. (See, ECF No. 28 and 30).

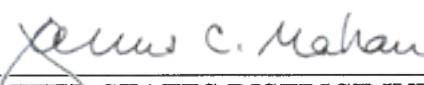
2 KEMP & KEMP

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4 By: /s/ James P. Kemp, Esq.
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5 Las Vegas, Nevada 89130
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8 IT IS SO ORDERED:

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10 
UNITED STATES DISTRICT JUDGE

11 Dated: November 27, 2019

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